

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARL G. SIMPSON & BONNIE REED	:	Case No. 1:00cv00014-SJD
SIMPSON, CO-ADMINISTRATORS OF	:	(Judge Dlott)
THE ESTATE OF CARL D. SIMPSON	:	
<u>et al.</u>	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	DEFENDANT, HAYES LEMMERZ
HAYES LEMMERZ INTERNATIONAL -	:	INTERNATIONAL - EQUIPMENT
EQUIPMENT AND ENGINEERING, INC.	:	& ENGINEERING, INC. D/B/A
d/b/a CMI - EQUIPMENT AND	:	CMI-EQUIPMENT & ENGINEER-
ENGINEERING, INC., et al.	:	ING, INC.'S SECOND AMENDED
	:	DISCLOSURE OF EXPERT
Defendants.	:	WITNESSES

** ** *

Now comes Defendant, Hayes Lemmerz International - Equipment & Engineering, Inc., d/b/a CMI-Equipment & Engineering, Inc. ("Hayes") and discloses the following expert witness whom it may call at trial:

Alan P. Gould

Mr. Gould is an Engineer and will be expected to testify on issues relating to the manufacturing, functioning and operation of the subject machine and the cause(s) of the incident that is the subject of this litigation.

Perry D. Jones

Gary P. Maul, Ph.D.

John "Jack" Schuldts
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Mulberry, Florida 33860

George Vredevelde
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Respectfully submitted,

s/Nancy J. Bride
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically via the Court's electronic filing system on this 2nd day of September, 2004.

s/Nancy J. Bride
Attorney for Plaintiff

CIN:605710.1